

# EXHIBIT 12

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 Civil Action No. 18-cv-2253-LLS

5 -----x  
6 CHANEL, INC.,

7  
8 Plaintiff,

9  
10 - against -

11 WGACA, LLC, WHAT COMES AROUND  
12 GOES AROUND LLC d/b/a WHAT GOES  
13 AROUND COMES AROUND, MHW  
14 PROPERTIES, INC., WGACA WEB, LLC,  
15 PINES VINTAGE, INC., VINTAGE  
16 DESIGNS LTD., and WCAGA LA, LLC,  
17 Defendants.

18 -----x

19 February 3, 2021  
20 10:02 a.m.

21 Continued Videotaped Deposition of  
22 FRANK BOBER, taken by Plaintiff, pursuant  
23 to 30(b)(6) Notice, held via Zoom  
24 videoconference, before Todd DeSimone, a  
25 Registered Professional Reporter and Notary  
Public of the States of New York and New  
Jersey.

<p style="text-align: right;">Page 235</p> <p>1 2 A P P E A R A N C E S : 3 SHEPPARD, MULLIN, RICHTER &amp; HAMPTON LLP 4 1901 Avenue of the Stars 5 Suite 1600 6 Los Angeles, California 90067 7 Attorneys for Plaintiff 8 BY: DYLAN J. PRICE, ESQ. 9 dprice@sheppardmullin.com 10 11 LEWIS BRISBOIS BISGAARD &amp; SMITH LLP 12 633 West 5th Street 13 Los Angeles, California 90071 14 Attorneys for Defendants 15 WGACA, LLC, et al. 16 BY: THOMAS S. KIDDÉ, ESQ. 17 thomas.kidde@lewisbrisbois.com 18 19 ALSO PRESENT: 20 21 STEVE MOLINA, Paralegal, Sheppard Mullin 22 23 JEFF MENTON, Videographer 24 25</p>	<p style="text-align: right;">Page 237</p> <p>1 F. BOBER 2 MR. KIDDÉ: Thomas Kiddé of 3 Lewis Brisbois Bisgaard &amp; Smith for 4 defendants and the witness. 5 * * * 6 F R A N K B O B E R, 7 called as a witness, having been first duly 8 sworn, was examined and testified 9 as follows: 10 EXAMINATION BY MR. PRICE: 11 Q. So, Mr. Bober, this is your 12 continued deposition. We had a session 13 last Wednesday, if you recall. 14 Did you do anything in between 15 the end of our last deposition, the last 16 session of the deposition on last 17 Wednesday, and this morning to prepare for 18 this continued part of your deposition? 19 A. Yes. 20 Q. And what did you do? 21 A. I looked at numbers of 22 documents, some exhibits, the 23 interrogatories. I spoke with Seth 24 Weisser, the CEO of What Goes Around, and 25 with Ambria Mische who is senior vice</p>
<p style="text-align: right;">Page 236</p> <p>1 F. BOBER 2 THE VIDEOGRAPHER: Good morning. 3 We are going on the video record. The time 4 is approximately 10:02 a.m. on Wednesday, 5 February the 3rd, 2021. 6 This is video media disk one of 7 the continued video-recorded deposition of 8 Frank Bober, the designated 30(b)(6) 9 representative. This deposition is being 10 held remotely. 11 My name is Jeff Menton, I am 12 the certified legal videographer, the court 13 reporter is Todd DeSimone, and we are both 14 from Veritext New York. 15 All counsel consented to this 16 remote video arrangement and waived any 17 objection to this manner of reporting. 18 Counsel will now state their 19 appearances and affiliation for the record 20 beginning with the noticing attorney, and 21 after that the court reporter will swear 22 the witness in. 23 MR. PRICE: Dylan John Price 24 with Sheppard, Mullin, Richter &amp; Hampton 25 LLP for plaintiff Chanel, Inc.</p>	<p style="text-align: right;">Page 238</p> <p>1 F. BOBER 2 president and general merchandise manager. 3 That's pretty much what I did. 4 Q. And what documents did you 5 review? 6 A. Too many to list. I mean, I 7 don't have a memory of every one. But I 8 looked at the spreadsheet again. I looked 9 at the exhibits. I looked at the 10 interrogatory that was referred to I think 11 in my last deposition, or it is at least in 12 the questions. 13 Q. The document request, is that 14 what you are referring to? 15 A. There was something about the 16 interrogatories that actually I have it 17 open on the screen. It is just 18 interrogatories. I looked at that. 19 Q. If you can look on the screen, 20 what set of interrogatories did you look 21 at; do you know? 22 A. The one that is, let's see what 23 it says, give me a second. 24 Q. Sure. 25 A. You know, it's just -- it's not</p>

<p style="text-align: right;">Page 507</p> <p>1 F. BOBER</p> <p>2 Q. And the individuals that</p> <p>3 handled the social media posts with Shannon</p> <p>4 Parker you have identified and then the</p> <p>5 replacement for Shannon who you are not</p> <p>6 sure of their name, they would have created</p> <p>7 the copy on the posts, right?</p> <p>8 A. Correct.</p> <p>9 Q. And selected the images to use</p> <p>10 for the post?</p> <p>11 A. Correct.</p> <p>12 Q. Do you know how many of WGACA's</p> <p>13 social media posts, you know, in a</p> <p>14 percentage, featured Chanel's name or</p> <p>15 trademarks?</p> <p>16 A. No.</p> <p>17 Q. And were the social media, I</p> <p>18 will just call them social media managers,</p> <p>19 Shannon or her replacement, were they given</p> <p>20 instructions as to how many of the posts</p> <p>21 should be featuring Chanel or Chanel</p> <p>22 trademarks?</p> <p>23 A. No.</p> <p>24 Q. If you had to estimate how many</p> <p>25 social media posts featuring Chanel's name</p>	<p style="text-align: right;">Page 509</p> <p>1 F. BOBER</p> <p>2 deleted posts. I don't know.</p> <p>3 Q. No, I'm saying assuming that</p> <p>4 nothing has been deleted, you would be able</p> <p>5 to see the posts by going to the account?</p> <p>6 A. Right, you would go there and</p> <p>7 you would see them.</p> <p>8 Q. Okay. What, to your knowledge,</p> <p>9 what is a hashtag?</p> <p>10 A. I think that's a further, let's</p> <p>11 say more pointed reference within a</p> <p>12 particular post that is also on</p> <p>13 particularly Instagram you can click on and</p> <p>14 look at all the posts that had that</p> <p>15 particular hashtag. So it's a -- it's a</p> <p>16 divider of information that relates to that</p> <p>17 post, and so you put a hashtag, you might</p> <p>18 put ten hashtags for one post.</p> <p>19 Q. And does WGACA use hashtags in</p> <p>20 its social media?</p> <p>21 A. Yes.</p> <p>22 Q. And why is it using the</p> <p>23 hashtags, what's the purpose of it?</p> <p>24 A. To keep people more engaged.</p> <p>25 Q. And WGACA has used the hashtag</p>
<p style="text-align: right;">Page 508</p> <p>1 F. BOBER</p> <p>2 or trademarks WGACA has posted on its</p> <p>3 social media accounts from 2014 to the</p> <p>4 present, what would your estimation be?</p> <p>5 A. I don't want to answer that. I</p> <p>6 have no idea.</p> <p>7 Q. More than 1,000?</p> <p>8 A. I have no idea.</p> <p>9 Q. Who would be a better person to</p> <p>10 answer that?</p> <p>11 A. I don't think anybody would</p> <p>12 know.</p> <p>13 Q. Does WGACA keep a repository of</p> <p>14 its social media posts?</p> <p>15 A. I don't believe so. If you</p> <p>16 post something to Instagram, they don't go</p> <p>17 away, so the repository is there for</p> <p>18 Instagram, you can scroll down, you will</p> <p>19 see them all.</p> <p>20 Q. Fair enough. Assuming no</p> <p>21 social media posts have been deleted, the</p> <p>22 social media posts that WGACA has done</p> <p>23 would be on its Instagram or Facebook page,</p> <p>24 right?</p> <p>25 A. Well, I can't testify to any</p>	<p style="text-align: right;">Page 510</p> <p>1 F. BOBER</p> <p>2 WGACACHANEL on its social media posts,</p> <p>3 right?</p> <p>4 A. Correct.</p> <p>5 Q. Digitalizing that, it is the</p> <p>6 alphanumeric sign which signifies hashtag</p> <p>7 and then WGACACHANEL, right?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. Who was responsible for</p> <p>10 creating the WGACACHANEL hashtag?</p> <p>11 A. I think Seth Weisser created</p> <p>12 that.</p> <p>13 Q. Do you know when Mr. Weisser</p> <p>14 created it?</p> <p>15 A. That might have been around</p> <p>16 2015, maybe it was 2016.</p> <p>17 Q. And WGACA started using it</p> <p>18 around that time, is that your</p> <p>19 understanding, 2015-2016?</p> <p>20 A. Yes.</p> <p>21 Q. And why was WGACA using the</p> <p>22 WGACACHANEL hashtag?</p> <p>23 A. We thought it was another good</p> <p>24 way to let people know that we had Chanel</p> <p>25 for sale.</p>

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<p style="text-align: right;">Page 511</p> <p>1 F. BOBER</p> <p>2 Q. Why not just tag like</p> <p>3 @ChanelOfficial, or whatever the Chanel</p> <p>4 official Instagram account is?</p> <p>5 A. What do you mean,</p> <p>6 @ChanelOfficial?</p> <p>7 Q. Well, you know --</p> <p>8 A. You mean send them to the</p> <p>9 Chanel website that doesn't exist?</p> <p>10 Q. Well, I believe Chanel has a</p> <p>11 social media handle that is</p> <p>12 @ChanelOfficial. Sometimes you would see</p> <p>13 that, right, they would tag, and I think</p> <p>14 that's a tag, and not a hashtag?</p> <p>15 A. Right.</p> <p>16 Q. Why not just tag the</p> <p>17 ChanelOfficial?</p> <p>18 A. I think I told you this the</p> <p>19 last time, there was -- I never read the</p> <p>20 book, but there was a book by Gloria</p> <p>21 Vanderbilt and the title of the book was It</p> <p>22 Seemed Like A Good Idea At The Time. So</p> <p>23 that's my answer, it seemed like a good</p> <p>24 idea at the time. As I said, I never read</p> <p>25 the book, but I love the title.</p>	<p style="text-align: right;">Page 513</p> <p>1 F. BOBER</p> <p>2 Q. Okay. So let's just take a</p> <p>3 look at --</p> <p>4 MR. PRICE: Steve, if you could</p> <p>5 pull up 1132 for me.</p> <p>6 A. Hey, Dylan, are you coming down</p> <p>7 to the wire?</p> <p>8 Q. I don't know about the wire,</p> <p>9 but we're coming down to it, yeah. No one</p> <p>10 else is able to testify as to the</p> <p>11 advertising issues.</p> <p>12 A. Well, I'm here.</p> <p>13 Q. So there is more of the</p> <p>14 advertising than there was --</p> <p>15 A. Yeah.</p> <p>16 THE WITNESS: Jeff, how many</p> <p>17 hours have I been on?</p> <p>18 THE VIDEOGRAPHER: Before we</p> <p>19 started this card, we were on four hours</p> <p>20 and 53 minutes, and now we're on an hour</p> <p>21 and 15 minutes. So that's six hours and</p> <p>22 seven minutes or something.</p> <p>23 THE WITNESS: All right. I</p> <p>24 actually wasn't so interested, but I just</p> <p>25 want Dylan to know.</p>
<p style="text-align: right;">Page 512</p> <p>1 F. BOBER</p> <p>2 Q. Is WGACA of the opinion</p> <p>3 currently that it was a good idea to use</p> <p>4 the WGACACHANEL hashtag?</p> <p>5 A. Then or now?</p> <p>6 Q. Now.</p> <p>7 A. We don't think that's a good</p> <p>8 idea.</p> <p>9 Q. Why not?</p> <p>10 A. Because we think that</p> <p>11 there's -- there could be a perception of</p> <p>12 an association that doesn't exist, and we</p> <p>13 don't want to mislead our customers.</p> <p>14 Q. Okay, fair enough. Was there</p> <p>15 a -- strike that.</p> <p>16 How was it determined which</p> <p>17 post to use the WGACACHANEL hashtag and</p> <p>18 which post not to? I know obviously the</p> <p>19 ones that featured Chanel. But other than</p> <p>20 that, was there, you know, a method for</p> <p>21 determining this post will get the</p> <p>22 WGACACHANEL hashtag, this one won't?</p> <p>23 A. There was not a method.</p> <p>24 Q. So it was more ad hoc?</p> <p>25 A. It was ad hoc.</p>	<p style="text-align: right;">Page 514</p> <p>1 F. BOBER</p> <p>2 MR. MOLINA: 1132 is up.</p> <p>3 A. All right, so wait a second,</p> <p>4 let me get to it. 1136?</p> <p>5 MR. KIDDÉ: 32.</p> <p>6 A. I'm sorry, say it again.</p> <p>7 Q. 1132.</p> <p>8 A. 1132. 1132, okay, I have it.</p> <p>9 Q. Okay. So you can take a look,</p> <p>10 just briefly browse through them if you</p> <p>11 want to get familiar.</p> <p>12 A. Yup.</p> <p>13 Q. So these are social media posts</p> <p>14 that WGACA did, right?</p> <p>15 A. Yeah.</p> <p>16 Q. And they all contain the WGACA,</p> <p>17 the ones that feature Chanel, I should say,</p> <p>18 contain the WGACACHANEL hashtag, right?</p> <p>19 A. Okay.</p> <p>20 Q. You see that?</p> <p>21 A. I do.</p> <p>22 Q. So I want to draw your</p> <p>23 attention to the sixth page of the</p> <p>24 document, and you will see, it is on a</p> <p>25 black screen and they look like blouses, it</p>

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<p style="text-align: right;">Page 515</p> <p>1 F. BOBER</p> <p>2 looks like earrings, but they are shirts,</p> <p>3 if that makes sense.</p> <p>4 A. Yeah.</p> <p>5 Q. And so these, the post refers</p> <p>6 to these enamel earrings as WGACACHANEL</p> <p>7 enamel earrings. Do you see that?</p> <p>8 A. I do.</p> <p>9 Q. Who made the decision to refer</p> <p>10 to the products as WGACACHANEL enamel</p> <p>11 earrings?</p> <p>12 A. Shannon.</p> <p>13 Q. And this was approved by WGACA,</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. Would WGACA today refer to</p> <p>17 products as WGACACHANEL products?</p> <p>18 A. No.</p> <p>19 Q. If you look at the date of</p> <p>20 these e-mail blasts, the first one,</p> <p>21 September 18th, 2017, you see that?</p> <p>22 A. I do.</p> <p>23 Q. And the last one, it looks like</p> <p>24 it is August 21st, 2017. Do you see that?</p> <p>25 A. I do.</p>	<p style="text-align: right;">Page 517</p> <p>1 F. BOBER</p> <p>2 A. Confirmed.</p> <p>3 Q. Okay. Did any of WGACA's</p> <p>4 employees ever raise concerns over the use</p> <p>5 of the WGACACHANEL hashtag?</p> <p>6 MR. KIDDÉ: Objection, it's</p> <p>7 vague.</p> <p>8 A. Not that I know of. Never to</p> <p>9 me.</p> <p>10 Q. But if there were internal</p> <p>11 concerns amongst the Marketing Department,</p> <p>12 you wouldn't know about that, right?</p> <p>13 A. I would probably know about it.</p> <p>14 Q. And at some point WGACA stopped</p> <p>15 using the WGACACHANEL hashtag, right?</p> <p>16 A. That's right.</p> <p>17 Q. Do you know when it stopped</p> <p>18 using it?</p> <p>19 A. Well, it's funny, I know 2017</p> <p>20 is when we stopped. I have seen one post</p> <p>21 from January of '18, I don't know how that</p> <p>22 snuck by, but all of these other posts,</p> <p>23 every one of them is from 2017, which is</p> <p>24 when we stopped.</p> <p>25 Q. Okay. And who made the</p>
<p style="text-align: right;">Page 516</p> <p>1 F. BOBER</p> <p>2 Q. So these posts were done after</p> <p>3 WGACA had received Barbara Solomon's cease</p> <p>4 and desist letter and had the</p> <p>5 correspondence with her that we looked at</p> <p>6 earlier, right?</p> <p>7 A. Correct.</p> <p>8 MR. PRICE: Can you pull up,</p> <p>9 Steve, the Facebook WGACACHANEL file that's</p> <p>10 in the new folder.</p> <p>11 A. A new exhibit?</p> <p>12 Q. Yeah, this will be the next in</p> <p>13 order.</p> <p>14 MR. MOLINA: This will be 1189.</p> <p>15 (Exhibit 1189 marked for</p> <p>16 identification.)</p> <p>17 Q. Just let me know when that</p> <p>18 comes up, Mr. Bober.</p> <p>19 A. I have it.</p> <p>20 Q. Okay. So these are Facebook</p> <p>21 posts from the WGACA, I'm sorry, the What</p> <p>22 Goes Around Comes Around Facebook page, and</p> <p>23 I just want you to just flip through these</p> <p>24 and confirm that these are all posts that</p> <p>25 WGACA posted to its Facebook page.</p>	<p style="text-align: right;">Page 518</p> <p>1 F. BOBER</p> <p>2 decision to stop using the hashtag?</p> <p>3 A. I think Seth Weisser made that</p> <p>4 decision, and I think I was involved in</p> <p>5 that decision as well.</p> <p>6 Q. Were there any written</p> <p>7 communications about the decision to stop</p> <p>8 using the hashtag?</p> <p>9 A. Not that I know of.</p> <p>10 Q. What do you recall about the</p> <p>11 discussions that you had with Mr. Weisser</p> <p>12 about stopping using the WGACACHANEL</p> <p>13 hashtag?</p> <p>14 A. My recollection is that it</p> <p>15 doesn't help us and it could just put us in</p> <p>16 a position of potentially somehow conveying</p> <p>17 association that we didn't have and didn't</p> <p>18 want to have, and so we just felt it was</p> <p>19 prudent to not use it.</p> <p>20 Q. Okay. What other hashtags,</p> <p>21 besides the WGACACHANEL hashtag, has WGACA</p> <p>22 used that featured the Chanel name?</p> <p>23 A. I don't know the answer to</p> <p>24 that.</p> <p>25 Q. Has WGACA used the Coco Chanel</p>

<p style="text-align: right;">Page 519</p> <p>1 F. BOBER</p> <p>2 hashtag?</p> <p>3 A. I don't know the answer,</p> <p>4 honestly.</p> <p>5 Q. So that would be a question for</p> <p>6 the Marketing Department?</p> <p>7 A. Well --</p> <p>8 Q. What's left of the Marketing</p> <p>9 Department.</p> <p>10 A. If we had one, it might be.</p> <p>11 Q. Okay.</p> <p>12 A. I don't think we have a</p> <p>13 big-time hashtag, you know, we're not using</p> <p>14 hashtags as much as we used to. It's not</p> <p>15 as -- we didn't obviously feel it is that</p> <p>16 important.</p> <p>17 MR. PRICE: Steve, could you</p> <p>18 bring up Exhibit 1020, please.</p> <p>19 MR. MOLINA: 1020 is now up.</p> <p>20 A. Okay, let me look, 1020.</p> <p>21 Q. WGACA at times in the past have</p> <p>22 used photographs from Chanel runway shows</p> <p>23 and Chanel models on its social media</p> <p>24 posts, right?</p> <p>25 A. I'm sorry, say that again.</p>	<p style="text-align: right;">Page 521</p> <p>1 F. BOBER</p> <p>2 use the photograph on its social media</p> <p>3 account?</p> <p>4 A. No.</p> <p>5 Q. Did WGACA have the Chanel, it</p> <p>6 looks like a bathing suit or leotard, for</p> <p>7 sale at the time that it posted this</p> <p>8 photograph?</p> <p>9 A. I'll bet we did.</p> <p>10 Q. Is there a way that you</p> <p>11 could -- I guess I suppose you could</p> <p>12 determine that by looking at the 47,000</p> <p>13 item chart?</p> <p>14 A. If it sold.</p> <p>15 Q. Okay. As you sit here today,</p> <p>16 you don't know whether they had that</p> <p>17 bathing suit or leotard or whatever it is?</p> <p>18 A. I don't know for sure.</p> <p>19 MR. PRICE: Let's take a look</p> <p>20 at, Steve, if you could pull up, this is in</p> <p>21 the new folder, it's the WGACA Pinterest</p> <p>22 Chanel ads file.</p> <p>23 MR. MOLINA: I'm introducing</p> <p>24 1190.</p> <p>25 (Exhibit 1190 marked for</p>
<p style="text-align: right;">Page 520</p> <p>1 F. BOBER</p> <p>2 Q. Yeah. In the past WGACA has</p> <p>3 used photographs of Chanel runway shows,</p> <p>4 Chanel models, in its social media posts,</p> <p>5 right?</p> <p>6 MR. KIDDÉ: Objection, it's</p> <p>7 vague.</p> <p>8 A. Yes.</p> <p>9 Q. And is Exhibit 20 an example of</p> <p>10 that?</p> <p>11 A. Which one?</p> <p>12 Q. I'm sorry, is Exhibit 1020 an</p> <p>13 example of that?</p> <p>14 A. Well, the only one that I see</p> <p>15 from what might be a runway show, which I</p> <p>16 don't know, is the first one.</p> <p>17 Q. Okay. I mean, do you think</p> <p>18 that first photo is a photograph that WGACA</p> <p>19 took?</p> <p>20 A. WGACA did not take that</p> <p>21 photograph.</p> <p>22 Q. Okay, thanks. And where did</p> <p>23 WGACA get the photograph; do you know?</p> <p>24 A. I don't.</p> <p>25 Q. And did WGACA have a license to</p>	<p style="text-align: right;">Page 522</p> <p>1 F. BOBER</p> <p>2 identification.)</p> <p>3 A. Okay, so let me do this. 1190?</p> <p>4 Q. Yes, please.</p> <p>5 A. One second. WGACACHANEL, okay.</p> <p>6 Q. So does this refresh your</p> <p>7 recollection as to whether WGACA has a</p> <p>8 Pinterest account?</p> <p>9 A. Yes.</p> <p>10 Q. And it's evident by these that</p> <p>11 WGACA does, right?</p> <p>12 A. Say that again.</p> <p>13 Q. And WGACA does in fact have a</p> <p>14 Pinterest account, right?</p> <p>15 A. It appears that way.</p> <p>16 Q. Would this have been Shannon</p> <p>17 Parker's purview to do these posts as well?</p> <p>18 A. Yes.</p> <p>19 Q. Or after she left, the person</p> <p>20 that replaced her?</p> <p>21 A. Correct.</p> <p>22 Q. So if you flip through here,</p> <p>23 there is various posts that WGACA has done</p> <p>24 using Chanel advertisements. Do you see</p> <p>25 that?</p>

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1 F. BOBER

2 the Court can make a determination and

3 then, if necessary, as to continuation of

4 the deposition under these circumstances.

5 MR. PRICE: All right, if

6 that's your position, that's your position.

7 I think the record is going to reflect,

8 though, the lack of preparation, but I

9 don't think we need to argue that for the

10 record.

11 MR. KIDDÉ: You may have a

12 different record than I do.

13 THE WITNESS: So are we done?

14 MR. PRICE: Well, that's

15 depending on who you talk to. But it

16 sounds like you guys are refusing to go any

17 further today, so it looks like --

18 THE WITNESS: Well, I think

19 that the --

20 MR. KIDDÉ: That's correct.

21 Frank, that's correct.

22 THE WITNESS: That's correct.

23 MR. PRICE: Okay.

24 THE WITNESS: Thank you. Bye.

25 THE VIDEOGRAPHER: Ready to go

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1 F. BOBER

2 off the video record?

3 MR. KIDDÉ: Yes.

4 THE VIDEOGRAPHER: This

5 concludes today's testimony given by Frank

6 Bober, the designated 30(b)(6)

7 representative. The total number of media

8 disks used was five of volume 2, and will

9 be retained by Veritext New York. The time

10 is 7:17 p.m. and we are going off the video

11 record.

12

13 [TIME NOTED: 7:17 p.m.]

14

15 \_\_\_\_\_

16 FRANK BOBER

17 \_\_\_\_\_

18 Subscribed and sworn to

19 before me this \_\_\_\_\_

20 day of \_\_\_\_\_, 2021.

21 \_\_\_\_\_

22 Notary Public

23

24

25

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BOBER	PRICE	4

5

6

7 EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
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9	REDACTED - Web	
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Exhibit 1187	Website Disclaimer	437
10 Exhibit 1188	Website Disclaimer	438
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	MHW Properties, Inc.,	
15	WGACA Web, LLC, Pines	
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16	Designs Ltd., and	
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19	DIRECTIONS NOT TO ANSWER	
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	(NONE)	
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1

2 CERTIFICATION

3

4 I, TODD DeSIMONE, a Notary Public for

5 and within the State of New York, do hereby

6 certify:

7 That the witness whose testimony as

8 herein set forth, was duly sworn by me; and

9 that the within transcript is a true record

10 of the testimony given by said witness.

11 I further certify that I am not related

12 to any of the parties to this action by

13 blood or marriage, and that I am in no way


14 interested in the outcome of this matter.

15 IN WITNESS WHEREOF, I have hereunto set

16 my hand this 11th day of February, 2021.

17

18

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20 \_\_\_\_\_

21 TODD DESIMONE

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